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April 5, 2023

Honorable Gregory H. Woods United States District Judge United States District Court Southern District of New York United States Courthouse 500 Pearl St. New York, NY 10007

Re: U.S. ex rel. Donohue v. Carranza, et al 1:20-C V-5396 (GHW)(SDA)

Dear Judge Woods:

This firm represents the Wake County Public School District and Superintendent Cathy Quiroz Moore (collectively "Wake County Defendants"), in the above-referenced matter.

Consistent with the requests made by other moving Defendants (ECF Nos. 277 & 278) and this Court's Individual Rules of Practice, Wake County Defendants respectfully request an extension of time of twenty-one (21) days after issuance of the Second Circuit mandate in this case to file a motion for attorneys' fees. This is the second requested extension of time and counsel for the Plaintiff-Relator has consented to the request.

Respectfully submitted,

/s/John A. Darminio John A. Darminio

Cc: All counsel of record via ECF